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15 May 2018

Via CM/ECF System

The Honorable Dora L. Irizarry
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Louis Vuitton North America Inc. v. Schenker S.A., et al.*
E.D.N.Y. 17 Civ. 7445 (DLI) (PK)
Our Ref 34149

Dear Chief Judge Irizarry:

We represent Worldwide Flight Services, Inc. (“WFS”) as successor in interest of defendant Cargo Airport Services USA, LLC (“CAS”), in the above-referenced action.

On 30 April 2018, WFS requested leave to file a motion for partial judgment on the pleadings and/or to stay this action without a pre-motion conference. Dkt. #21. Plaintiff Louis Vuitton North America Inc. (“LVNA”) responded in opposition on 11 May 2018. Dkt. #24.

Unfortunately, LVNA’s response contains *significant* omissions and misstatements of law, particularly with respect to Article 22.5 of the Montreal Convention (which governs this case) and Article 25.1 of the Warsaw Convention (the predecessor treaty).

We therefore request permission to file a reply letter of no more than 3 pages, outlining the numerous legal authorities that support WFS’s position—before the Court determines whether to grant WFS leave to file its proposed motion. Alternatively, WFS is prepared to submit a comprehensive memorandum in support of the motion.

We thank the Court for its attention to, and consideration of, the foregoing request

Respectfully submitted,
HILL RIVKINS LLP

A handwritten signature in blue ink, appearing to read 'J. Heilig'.

Justin M. Heilig

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